

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JUNE CULROSS

Plaintiff,

v.

FALLON CLINIC, INC. and  
MARLENE DODGE

Defendants.

C. A. No. **05-40092FDS**

**ASSENTED TO JOINT MOTION TO EXTEND THE TIME FOR DEFENDANTS TO  
FILE A RESPONSIVE PLEADING TO PLAINTIFF'S COMPLAINT**

The Parties hereby submit this Joint Motion To Extend The Time For Defendants To File A Responsive Pleading to Plaintiff's Complaint ("Joint Motion"). In support of this Joint Motion, the Parties state as follows:

1. By this action, the Plaintiff alleges that Defendants violated the Family Medical and Leave Act ("FMLA") and M.G.L. c. 151B. Specifically, Plaintiff alleges that Defendants interfered with the exercise of her rights pursuant to the FMLA and discriminated against her on the basis of her alleged handicap.

2. Presently, the deadline for filing a responsive pleading to Plaintiff's Complaint is September 30, 2005.

3. Since receiving the Complaint, counsel for the Parties have had ongoing discussions regarding the possibility of settling the case.

4. Settlement negotiations have progressed significantly to the point where, presently, counsel for the Parties have exchanged drafts of a proposed settlement agreement and are negotiating the final terms of an agreement.

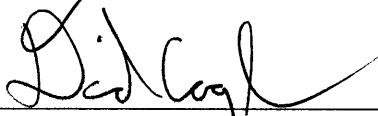
5. Because the Parties intend to work in good faith toward final resolution of the matter and they also wish to avoid unnecessary time and expense in filing unnecessary pleadings, the Parties have agreed that Defendants need not file a responsive pleading until the Parties determine whether they can agree on the final language of a settlement agreement.

6. Accordingly, the Parties request that the deadline for submission of a responsive pleading be extended to October 30, 2005.

7. The Parties will not be prejudiced by this extension.

WHEREFORE, the Parties respectfully request that the Court extend the time for Defendants to file a responsive pleading to October 30, 2005.

FALLON CLINIC, INC. and  
MARLENE DODGE  
By their attorneys,



Gary M. Feldman, BBO # 162070  
David M. Cogliano, BBO # 630158  
DAVIS, MALM & D'AGOSTINE, P.C.  
One Boston Place  
Boston, MA 02108  
(617) 367-2500

JUNE CULROSS  
By her attorney,



Ilene Titus BBO #045110  
Attorney At Law  
120 Main Street  
Worcester, MA 01608  
(508-799-8784)

Dated: September 30, 2005